## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION Master File No. 2:12-MD-02327 MDL No. 2327

THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

## JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the "Ethicon Defendants"), jointly move to dismiss with prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41. No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs. Respectfully submitted,

/s/ Sean P. Tracey
Sean P. Tracey
Tracey & Fox Law Firm
440 Louisiana
Suite 1901
Houston, TX 77002
(800) 925-7216
Stracey@traceylawfirm.com
Counsel for Plaintiff

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com
Counsel for the Ethicon Defendants

## **CERTIFICATE OF SERVICE**

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

## **EXHIBIT A**

Civil Action	Case Name	
No.		
2:12-cv-01318	Marie Smith and Windrick Smith	vs. Ethicon, Inc.; Johnson & Johnson
2:13-cv-11505	Della Martin	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-28164	Jeanette Losh	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-28658	Barbara Davison	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-30648	Jacqueline Howell	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-31149	Wanda Henderson	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-31151	Laurel Chapman	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-32242	Carmen Marshalek	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-32294	Nereida Matos	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-02521	Patsy McFee and John McFee	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-10955	Genevieve Hilliard	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-10959	Louise Linville-Lenz and Leonard Lenz	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-10960	Iliana Lopez and Raul Martinez	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-10962	Irena Mogielska	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-23853	Tammi Pointer	vs. Ethicon, Inc.; Johnson & Johnson
2:15-cv-06050	Patricia Finlayson	vs. Ethicon, Inc.; Johnson & Johnson
2:15-cv-11288	Ingrid Perle-Heydon	vs. Ethicon, Inc.; Johnson & Johnson
2:16-cv-00595	Debra Richards	vs. Ethicon, Inc.; Johnson & Johnson
2:16-cv-00846	Mary Roberts and Howard C. Roberts	vs. Ethicon, Inc.; Johnson & Johnson
2:16-cv-01031	Karen McKee and Adrian McKee	vs. Ethicon, Inc.; Johnson & Johnson
2:16-cv-01032	Kimberly Dagenais and Richard Dagenais	vs. Ethicon, Inc.; Johnson & Johnson
2:16-cv-01235	Martina Ruiz Diaz	vs. Ethicon, Inc.; Johnson & Johnson

2:16-cv-05939	Peggy Abbott	vs. Ethicon, Inc.; Johnson & Johnson
2:17-cv-01526	Babette Golden,	vs. Ethicon, Inc.; Johnson & Johnson
	Representative of the	
	Estate of Cynthia Riddell	
2:17-cv-01592	Glennette Edwards	vs. Ethicon, Inc.; Johnson & Johnson
2:17-cv-01683	Maria Parr	vs. Ethicon, Inc.; Johnson & Johnson